

MEMO ENDORSED

GIBBS LAW GROUP  
— L L P —

By eFile

July 19, 2021

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Hon. Edgardo Ramos  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: Chambers v. HSBC Bank USA, N.A., Case No. 1:19-cv-10436-ER

Dear Judge Ramos:

We represent Plaintiff Patrice Chambers in the above-referenced action. We write, together with counsel for Defendant HSBC Bank USA, N.A., to request the Court stay all deadlines in this case while the parties engage in mediation. The parties have exchanged information to engage in a substantive mediation effort and scheduled mediation for September 13, 2021 with the Honorable Morton Denlow, retired U.S. Magistrate Judge for the United States District Court for the Northern District of Illinois. The parties request 30 days following the mediation to file a status update informing the Court of the outcome of the mediation and requesting new discovery deadlines, if needed.

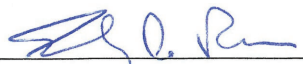
Parties request this stay to allow them to focus on the mediation and avoid potentially unnecessary costs and expenses that the parties will incur between now and the mediation. *See* Scheduling Order, ECF No. 45.

This is the parties' first request to stay the proceedings. The Court previously granted HSBC an unopposed 30-day extension to respond to Plaintiff's Complaint. ECF Nos. 5. The Court also extended the deadlines to file the motion to dismiss opposition and reply briefs by two weeks. ECF No. 25.

/s/ David M. Berger

cc: All Counsel of Record (via ECF)

The request is GRANTED. The Clerk of Court is respectfully directed to stay this case. The case management conference scheduled for October 7, 2021 is adjourned *sine die*. The parties are instructed to submit a status report by no later than October 13, 2021. It is SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: 7/20/2021  
New York, New York